

1 **COHELAN KHOURY & SINGER**

Michael D. Singer (SBN 115301)

2 Msinger@ckslaw.com

Diana M. Khoury (SBN 128643)

3 dkhoury@ckslaw.com

J. Jason Hill (SBN 179630)

4 jhill@ckslaw.com

605 C Street, Suite 200

5 San Diego, CA 92101

Tel: (619) 595-3001/Fax: (619) 595-3000

6 **THE PHELPS LAW GROUP**

7 Marc H. Phelps (SBN 237036)

8 Marc@phelpslawgroup.com

23 Corporate Plaza Drive, Suite 150

Newport Beach, CA 92660

9 Tel: (949) 629-9533/Fax: (949) 629-2501

10 **THE CARTER LAW FIRM**

11 Roger R. Carter (SBN 140196)

roger@carterlawfirm.net

12 23 Corporate Plaza Drive, Suite 150

Newport Beach, CA 92660

13 Tel: (888) 914-6900/Fax: (949) 629-2501

14 Counsel for Plaintiff Luben Romanov, and
the conditionally certified Class

15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA**

18 LUBEN ROMONOV, on behalf of
19 himself and all others similarly situated,

20 Plaintiff,

21 v.

22 AMAZON.COM SERVICES LLC, a
23 Delaware limited liability company; and
24 DOES 1 through 20, inclusive,

25 Defendants.

Case No. 2:20-cv-02692 (KSx)

26 **DECLARATION OF MARY BUTLER**
27 **ON BEHALF OF SIMPLURIS, INC.,**
28 **REGARDING NOTICE AND**
SETTLEMENT ADMINISTRATION

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1 regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and
2 will remain in operation throughout the settlement process. Callers have the option to
3 speak with a live call center representative during normal business hours or to leave a
4 message and receive a return call during non-business hours. The toll-free telephone
5 number included in the Class Notice was 1-866-612-9330.

6 **NOTIFICATION TO THE CLASS**

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8 5. On October 21, 2021, Simpluris received the Court-approved Notice
9 Packet from Plaintiffs' Counsel. The Notice Packet advised Class Members of their
10 right to opt out from the Settlement, object to the Settlement, or do nothing, and the
11 implications of each such action. The Notice Packet advised Class Members of
12 applicable deadlines and other events, including the Final Approval Hearing, and how
13 Class Members could obtain additional information. A true and correct copy of the
14 content of the Notice Packet is attached hereto as "**Exhibit A**".

15 6. On November 19, 2021, Counsel for Defendant provided Simpluris with
16 a mailing list containing the name, last known address, Social Security Number, and
17 pertinent employment information during the Class Period for the Class Members.
18 The Class List contained data for 4,983 unique Class Members.

19 7. The mailing addresses contained in the Class List were processed and
20 updated utilizing the National Change of Address Database ("NCOA") maintained by
21 the U.S. Postal Service. The NCOA contains changes of address filed with the U.S.
22 Postal Service. In the event that any individual had filed a U.S. Postal Service change
23 of address request, the address listed with the NCOA was utilized in connection with
24 the mailing of the Notice Packets.

25 8. On December 10, 2021, after updating the mailing addresses through the
26 NCOA, Notice Packets were mailed via First Class Mail to 4,983 Class Members
27 contained in the Class List.
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1 9. As of this date, 342 Notice Packets were returned by the post office. For
2 those without a forwarding address, Simpluris performed an advanced address search
3 (i.e. skip trace) on all of these addresses by using Accurint, a reputable research tool
4 owned by Lexis-Nexis. Simpluris used the Class Member's name, previous address and
5 Social Security number to locate a more current address. Two hundred ninety-eight
6 (298) Notice Packets were re-mailed to either a newfound address, with forwarding
7 addresses provided by the United States Postal Service or at the request of the Class
8 Member. Class Members who receive a remailed Notice Packet have an additional 20
9 days to opt out or dispute the workweek information. Ultimately, after additional
10 searches, 44 Notice Packets are undeliverable because Simpluris was unable to find a
11 better address.

12 **DISPUTES, EXCLUSIONS, OBJECTIONS, AND CHANGE OF**
13 **ADDRESS FORMS**

14 10. Class Members have until February 8, 2022, to submit a dispute. Class
15 Members who received a remailed Notice Packet will have until February 28, 2022 to
16 submit a dispute. As of this date, Simpluris has received no disputes.

17 11. Class Members have until February 8, 2022, to submit a request for
18 exclusion. Class Members who received a remailed Notice Packet will have until
19 February 28, 2022 to submit a request for exclusion. As of this date, Simpluris has
20 received no requests for exclusion from the Settlement.

21 12. Class Members have until February 8, 2022, to submit written objections.
22 Class Members who received a remailed Notice Packet will have until February 28,
23 2022 to submit written objections. As of this date, Simpluris has not received any
24 written objections. (The Agreement provides that Class Members may appear at the
25 Final Approval Hearing even if they have not returned a written objection. Settlement
26 Agreement, page 13, paragraph (a).)

27 13. To date, Class Members have returned 59 change of address forms.
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